

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

**MOTION TO SUSTAIN PLAINTIFF'S OBJECTION TO REQUESTS FOR ADMISSIONS OR
IN ALTERNATIVE TO ENLARGE THE TIME FOR PLAINTIFF TO RESPOND**

Come now the Plaintiffs, Justin McKennon and Andre Stephens (“these Plaintiffs”) and move the Court to sustain their objection to the Defendants ABL Management, Inc. and Genella Potter’s (“these Defendants”) Requests for Admissions. This case is consolidated for discovery purposes with the cases of *Germontric Driver v. George, et al.* 1:12-cv-54, *Brandon Frazier v. George, et al.* 1:12-cv-128, *Larry McGuire v. George et al.* 1:12-cv-82, *James Wall v. George, et al.* 1:12-cv-118, and *Chad Martin v. Enoch George et al.* 1:12-cv-170.

These Requests for Admissions were mailed to these Plaintiffs on March 11, 2014. The deadline for written requests in the case management order is 20 days, and the deadline for written discovery is March 31, 2014.

These Defendants submitted a total of 760 requests for admission for the six consolidated cases, comprising a total of approximately 182 pages. A copy of the Requests submitted to these Plaintiffs is attached in their respective cases.